

FY 2000 Sector Based Environmental Protection Action Plan

I. Executive Summary

The Environmental Protection Agency (EPA) has been exploring new approaches to environmental protection that go beyond current traditional media-specific or chemical-specific programs. One such approach is the sector-based approach to environmental protection (the sector approach). A sector-based approach involves collaborative problem solving to focus on a particular business, service, or industrial sector to achieve environmental results. At a minimum, a sector-based approach focuses on a sector as the basic analytical unit for identifying environmental problems and framing solutions; however, this focus can be expanded to a “cluster” of other entities through the producer-supplier-customer chain and other networks that directly impact a sector. A sector approach is often multi-media in perspective and usually encourages pollution prevention. Frequently, a sector-based approach involves multiple stakeholders.

A sector approach can result in better solutions – more efficient, effective, and timely – to achieve enhanced environmental results, while making it simpler for regulated entities to comply with environmental requirements. A sector-based approach offers a dynamic, on-going process that can proactively promote continuous improvement in environmental performance, fostering sustainable (including economically sustainable) industry sectors in livable communities. A sector-based approach enables EPA to engage all interested and affected parties in identifying and acting on solutions, thereby serving as a catalyst for improvement. It can increase trust and understanding among all participating entities. Sector-specific programs can lead to greater stakeholder participation and progress because they can provide incentives for greater stewardship that are unique to the sector. Ultimately, a sector-based approach transfers lessons learned into core regulatory functions and provides opportunities for adaptation in other venues.

The approach was demonstrated through the EPA’s Common Sense Initiative (CSI), a pilot program that tested multi-media sector-based approaches to protect the environment in a “cleaner, cheaper, and smarter” way. In February of 1998, based on lessons learned from CSI and other sector approaches, Administrator Browner called for a transition from the pilot stage of sector work to its overall integration into the core functions of the Agency. To make this transition in an orderly and meaningful way, the Agency developed a Sector Action Plan for FY 99. The Action Plan described for the Agency and its external stakeholders how a sector-based approach, when applied as a problem-solving tool in appropriate circumstances, could result in better environmental performance and solutions. In developing the Action Plan, the Agency looked at numerous on-going programs, in addition to CSI, that were making effective use of multi-media sector approaches, with some of the more notable including the Sustainable Industry Program, the Design for the Environment Program, and the Compliance Assistance Centers. Thus, in creating the FY 99 Action Plan, the Agency did not start from scratch to create an entirely new sector program; rather, the Agency chose to apply its experiences in these sector efforts to the way it conducts its core functions -- writing permits, crafting regulations, enforcing and ensuring compliance, conducting research, solving regional problems, building voluntary partnerships, and even working internationally. This integration of a sector approach into Agency core functions was the overall goal of Administrator Browner’s transition from the initiative phase of CSI.

The FY 2000 Sector Action Plan continues the Agency's transition efforts and serves to re-emphasize the Agency's strong commitment to applying a sector approach, where appropriate, for achieving environmental protection. The purpose of the FY 2000 Sector Action Plan is to encourage the use of cross-Agency, multi-media sector-based approaches to solve environmental problems and to improve our system of protecting public health and the environment. This Action Plan discusses how the Agency is applying sector approaches, particularly cross-Agency, multi-media approaches, to Agency core functions, how it's building management capacity to facilitate application of sector-based approaches, and how it's providing for stakeholder involvement in the development and application of environmental solutions.

As in FY 99, the Sector Action Plan for FY 2000 is a product of the entire Agency, prepared by staff and management with wide, cross-Agency representation. In addition, this Plan was written in close collaboration with the National Advisory Council for Environmental Policy and Technology (NACEPT) Standing Committee on Sectors. Members of this Committee, which is a subcommittee of the NACEPT Council, include representatives of state and local governments, tribes, academia, industry, environmental and public interest groups, and environmental justice representatives.

II. How is "Sector" defined?

It is important from the outset that "sector" is clearly defined. For over 60 years, the U.S. has used a classification system, known as the Standard Industrial Classification (SIC) system, to classify businesses and to report industry statistics. The SIC system classifies establishments by their primary type of activity, and has focused almost exclusively on manufacturing. When referring to industrial sectors, the Agency historically has used SIC codes as a reference method. The SIC system breaks down industrial sectors into 10 broad areas that are further subdivided into more than one thousand distinct industrial activities within the broader categories. As of 1997, the U.S. began replacing the Standard Industrial Classification of sectors with a system known as the North American Industry Classification System (NAICS). This system is based on production and groups together establishments that use similar processes and inputs to produce a good or service. Whereas SIC broke down sectors into 10 broad areas, NAICS groups industries in our economy into 20 broad sectors (see **Table 1** for a comparison of the broad classifications of sectors in SIC versus NAICS). Within these 20 broad sectors, NAICS provides 1,170 detailed United States industry classifications, a 15-percent increase in total subdivisions compared to those available under the SIC.

When we refer to a *sector* in this Action Plan, like the FY 99 Action Plan, we will use the definition of a sector as a discrete production system in the U.S. economy. By that we mean any of the NAICS' 20 broad sectors or any of the 1,170 detailed classifications within these sectors. For example, the Agency could consider Agriculture, Forestry, Fishing, and Hunting (one of the 20 broad NAICS' sectors) as a sector, or the Agency could consider a subset of this sector, Animal Production, for a more focused effort. Agency experience (e.g., via the CSI program) has shown that industries within a sector may vary tremendously, and separation into sub-sectors may sometimes provide a better opportunity to identify barriers, issues, and solutions. In addition to focusing on the traditional "industrial" sectors (e.g., chemical manufacturing and petroleum refining), a sector approach also could focus on non-industrial

sectors such as service sectors, which may include laundry services (e.g., dry cleaners), automotive repair and maintenance services, and educational services (e.g., colleges and universities). Although not considered traditional “industrial” sectors, these groups often share regulatory issues and environmental impacts, much like the industrial sectors.

While the NAICS classification scheme focuses on collections of similar types of establishments, whether they are industrial, service industry, or others, it is important to recognize that functionally, activities within a sector

could impact more than the businesses that fall within that particular sector. For example, a production sector may include an integrated group of different types of firms and organizations that participate together to produce a similar good or service. Thus, a sector may include various producers, suppliers, and customers that are linked together in an integrated system of production, only one of which actually produces the product that determines their common grouping. For example, suppliers of raw materials to a certain industry, or customers of that industry, may have as much influence on environmental decision-making as do government regulations. In such cases, broader collaboration among establishments in a target

sector and its customers and suppliers may achieve environmental results that could not ordinarily be achieved through focusing simply on the specific establishments. A sector approach, therefore, offers an important opportunity to identify and examine a range of establishments that may impact and help define environmental issues associated with a particular sector.

Table 1. SIC versus NAICS Sectors

SIC Division Titles	NAICS Sector Titles
< Agriculture, Forestry, Fishing	< Agriculture, Forestry, Fishing, Hunting
< Mining	< Mining
< Construction	< Construction
< Manufacturing	< Manufacturing
< Transportation, Communications, and Public Utilities	< Utilities < Transportation and Warehousing
< Wholesale Trade	< Wholesale Trade
< Retail Trade	< Retail Trade < Accommodation and Food Services
< Finance, Insurance, and Real Estate	< Finance and Insurance < Real Estate, Rental, Leasing
< Services	< Information < Professional, Scientific, Technical Services < Administrative, Support, Waste Management and Remediation Services < Educational Services < Health Care and Social Assistance < Arts, Entertainment, Recreation < Other Services (except Public Administration)
< Public Administration	< Public Administration
None (previously, categories within each division)	< Management of Companies and Enterprises

III. Background

A. The Agency's Formative Years

Since the creation of EPA in 1970, the Agency generally has been organized according to the individual environmental statutes that Congress has authorized it to administer. Thus, EPA has carried out its mission according to environmental media (air, water, land) or by chemicals (pesticides, toxic substances, or hazardous wastes), tending to focus its efforts within the boundaries of these media or chemical programs as opposed to employing an integrated, multi-media approach for particular industrial sectors. While some programs have focused their regulations on specific sectors – the air program promulgates regulations governing air emissions for certain industrial sectors and the water program promulgates effluent guidelines for individual industries – less attention has been given to considering regulation of these industries on a multi-media basis.

A number of the successes achieved by the Agency have largely been based on an approach whereby federal and state governments have set standards, issued permits for discharges, and then inspected, monitored, and enforced the standards set for each environmental statute. As we achieved those successes, we also learned about the limitations of this approach. The focus on the use of “end-of-pipe” approaches tended to overshadow the potential benefits of “upstream” pollution prevention programs. Additionally, the Agency’s regulatory process generally had not provided for a robust involvement of stakeholders outside of the formal public comment and hearing process.

While “reinventing environmental regulation” generally is considered to be a very recent Agency phenomenon, it is fair to say that the Agency has offered flexible regulatory approaches in the past. For example, since the 1990 Clean Air Act Amendments, the Agency’s air program has been building trade approaches and other flexible programs into its regulations, has made considerable use of voluntary programs, and has extensively involved stakeholders prior to and early in the regulatory process outside of the formal notice and comment process. Nevertheless, it was not until the early-to-mid ‘90's that the Agency began to consider broad-based changes in the way it conducts its mission.

B. Recent History Leading Up to an Agency Emphasis on Sectors

In 1994, Administrator Browner introduced the Common Sense Initiative (CSI), with the goal of moving beyond the media-specific legal and organizational structure that has evolved from the establishment of the nation’s separate environmental laws to find ways to make the system work more effectively for specific industry sectors and other external stakeholders. In 1995, the Clinton Administration announced a major program designed to reinvent environmental regulation. This program endorsed a series of “reinvention” efforts aimed at the design and implementation of new, innovative tools and approaches to improve and expand our current system of environmental protection. These reinvention efforts included the Common Sense Initiative among the numerous actions intended to reinvent the way the Agency carries out its mission. Through CSI, the Agency sought to work collaboratively with various business sectors it regulates, seeking mutually acceptable ways to achieve multi-media pollution prevention and go beyond regulatory requirements in the control of pollutant emissions. The Agency

worked not only with industry in these efforts; it also advanced the involvement of co-regulators and other external stakeholders who had an interest in environmental protection.

In all, more than 300 individuals, representing six industry sectors (automobile manufacturing, iron and steel, petroleum refining, printing, metal finishing, and computers and electronics) and other interested parties (representing the Agency; state, tribal, and local governments; and labor, environmental, public interest, and environmental justice groups), came together to analyze problems, test solutions, and make recommendations for improving environmental management capabilities. CSI's accomplishments include over 40 individual projects and almost 30 formal recommendations that, as they are being implemented, are changing the way the Agency does business. (For a complete listing and update of all of the CSI projects, the reader is encouraged to visit EPA's sector web site at www.epa.gov/sectors.)

A less tangible, but equally important outcome of CSI, was the fostering of an improvement in historically adversarial relationships among many businesses, government regulators, communities, and labor and environmental groups. Of particular importance in the CSI process was the inclusion of community representatives in each of the six sector subcommittees. Heretofore, communities have had limited means for raising concerns about environmental decision making that affects the lives of community members. By sitting at the same table with regulators and the regulated community, community groups were able to express their concerns regarding environmental, public health, and land use issues in a manner that made others at the table understand just how environmental decisions can impact the lives of "ordinary" citizens.

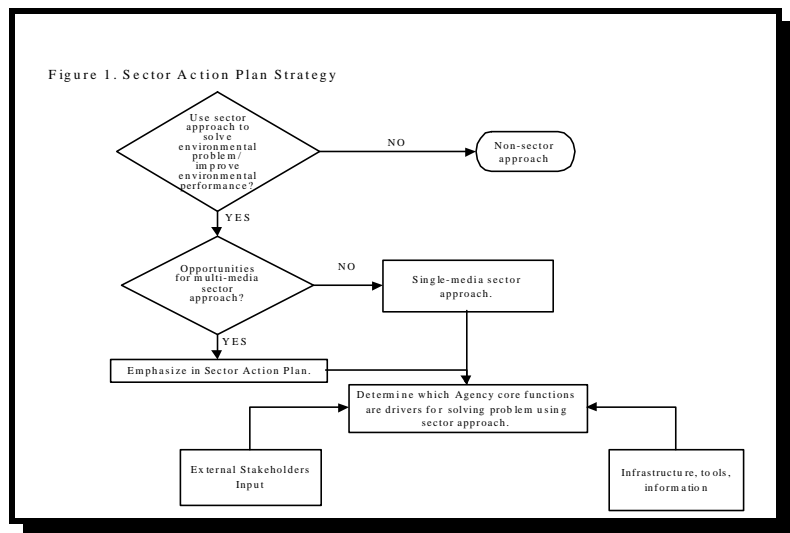
In February 1998, the Administrator announced the transition of the CSI program to a broader sector application throughout the Agency's core functions. This announcement did not mark the end of all of the projects started under the CSI program; rather it served to celebrate the success of CSI as an important building block for future sector activities in the Agency. In addition to directing the Agency to continue projects begun under CSI, the Administrator also directed the Agency to strengthen its capacity to integrate, where appropriate, sector-based approaches into the way it conducts its core functions. The Administrator thus directed the Office of Reinvention to lead the Agency, and work with external stakeholders, to develop an Action Plan for FY 99 to aid in implementation of an Agency-wide sector approach to environmental protection. The FY 99 Action Plan was to serve as a tool for enabling Agency decision-makers to determine when, where, and how to use sector-based approaches to effectively and efficiently solve environmental problems.

C. Overview of the FY 99 Sector Action Plan

The overall goal of the FY 99 Sector Action Plan was to promote the integration of a sector approach into Agency activities, where appropriate, to solve environmental problems. The FY 99 Plan established a three-prong framework upon which to apply sector-based approaches throughout the Agency. The FY 2000 Action Plan will continue to build upon the success of the FY 99 framework:

- (1) Implementing sector-based approaches within Agency core functions (which include permitting, rulemaking, enforcement and compliance, solving regional problems, voluntary partnerships, research, international activities);

- (2) Building internal management structure and processes that facilitate sector-based activities (developing infrastructure, sharing information, and building analytical capacity); and
- (3) Working with external stakeholders (creating an external advisory committee on sectors as a forum for dialogue and input, and building internal capacity to conduct meaningful stakeholder processes).



The FY 99 Action Plan highlighted certain sector activities occurring across the Agency in these areas to exemplify how the Agency is working to incorporate a sector orientation into the way it conducts its business (the actions highlighted in the FY 99 Plan were not meant to be a comprehensive listing of all Agency sector actions). A copy of the FY 99 Plan can be found at www.epa.gov/sectors.

The three-prongs of the framework, when viewed holistically, provide a strategic approach for integrating a sector perspective into the way the Agency conducts business. The sector-based strategy addresses: (1) the core work performed by EPA; (2) the barriers to the adoption of sector-based approaches, and the opportunities to overcome these barriers by building employee skills, internal management infrastructure, and analytical capability; and (3) partnerships with external stakeholders to help develop and implement sector projects. **Figure 1** illustrates how the three prongs of the Sector Action Plan strategy work when applying a sector approach, particularly an integrated, multi-media approach, to the way the Agency carries out its mission.

D. Applying Lessons Learned to the FY 2000 Action Plan

1. Benefits of a Sector-Based Approach

The FY 99 Sector Action Plan captures many of the lessons the Agency has learned through its experiences with sector-based activities. The Plan provides further specifics regarding the various

models for sector-based environmental protection, the benefits and barriers to a sector-based approach, and the process to use when determining whether a sector-based approach is appropriate. The reader is encouraged to refer to the FY 99 Action Plan for a complete discussion of these lessons learned.

A number of these lessons are worth re-emphasizing in the FY 2000 Action Plan. In particular, it is important to convey the benefits of applying a sector perspective to solve problems associated with protecting human health and the environment. These problems can be environmental pollution issues (e.g., smog, acid rain, non-point source water pollution) or problems associated with resolution of these pollution issues (e.g., inefficient permitting processes that can affect a business's "bottom line" and create barriers for improving environmental performance). Agency

experience in solving environmental problems by organizing efforts around a particular sector or sectors demonstrates how such an approach can effectively achieve resolution. **Figure 2** illustrates the Agency's past and current uses of sector approaches for achieving results. Additional benefits of a sector approach accrue when the solution is multi-media in nature and considers the perspective of stakeholders external to the Agency (see **Table 2** for a summary of these benefits).

Figure 2. Sector Approaches for Achieving Results are Found in the Agency's....

....**compliance/enforcement** program, which uses a sector perspective to target environmental compliance problems and to assure compliance within a particular sector.

....Sustainable Industry (SI) Program, which works collaboratively with a particular sector to **create incentives and remove barriers** to help solve environmental problems, improve that sector's overall environmental management, and promote environmental stewardship.

....Design for the Environment (DfE) Program, which seeks to prevent pollution by working collaboratively with a sector to promote the incorporation of environmental considerations into **process re-design and re-engineering**.

....Persistent, Bioaccumulative, and Toxic (PBT) Chemical Initiative, which seeks to reduce risks to public health and the environment from existing and future exposure to priority PBT **pollutants** by focusing on those sectors that generate these pollutants.

....air and water programs, which craft sector-specific **regulations** to address environmental problems associated with particular sectors.

2. Benefits of a Multi-media Sector-Based Approach

We have found that coordination of a sector approach across environmental media/statutes and across Agency organizational boundaries (program offices and regions), where appropriate, provides for a more comprehensive solution to the problem than would a solution with a single media/single office perspective. Integrated, multimedia approaches to environmental problems make shifting pollution from one environmental medium to another harder to do. By allowing and encouraging industry and government to consider releases to all environmental media, the value of pollution prevention (i.e., eliminating pollution at the source) becomes clearer from both an environmental

and economic perspective. Further, we have found that sector initiatives that encompass activities in the various Agency core functions, such as permitting, rulemaking, and compliance/enforcement, help establish critical links between the work of different parts of the Agency and result in much more strategic sector solutions. Thus, when applying a sector approach, the more linkages that occur across media, across Agency programs and regions, across Agency core functions, and even between EPA and its co-regulators/co-implementers (states, local governments, and Tribes), the more comprehensive the sector approach becomes and the more it is integrated into the Agency's mode of conducting business. It is important to note that while single media, non-sector approaches may be a viable option for resolving some environmental problems, the FY 2000 Action Plan emphasizes and encourages a multi-media, cross-Agency sector approach. **Appendix I** provides examples of the benefits of an integrated multi-media, multi-stakeholder sector approach to solving environmental problems within Agency core functions, and how this approach differs from single media, limited stakeholder, and non-sector perspectives.

Table 2. Summary of Sector Benefits

The benefits of sector-based approaches include:

- < provides a better exchange of information
- < enhances understanding and communication
- < provides a more comprehensive perspective of the issues
- < builds trust and lasting relationships
- < provides early identification of barriers and incentives
- < improves compliance
- < promotes solutions that go beyond compliance
- < helps enable non-regulatory solutions

Multi-media sector-based approaches add the following benefits:

- < prevents/controls transfer of pollution from one medium to another
- < facilitates consideration of pollution prevention opportunities
- < enables identification and avoidance of duplication and inconsistency
- < results in a more cost-effective solutions

Multi-stakeholder sector-based approaches add the following benefits:

- < enhances public participation
- < increases public access to information
- < enriches the quantity and quality of information available, thus improving solutions
- < ensures greater accountability to interested parties
- < provides a sense of "ownership" for participants

3. Stakeholder Benefits of a Sector-Based Approach

Working with stakeholders to obtain external perspective and buy-in of sector-based solutions is yet another important component of a sector-based solution. For this reason, the FY 2000 Action Plan includes activities designed to build internal capacity to conduct stakeholder activities. The Agency is working with NACEPT to ensure that stakeholder participation in sector activities is meaningful, both for the stakeholders and for the Agency. Sector efforts can benefit enormously by the leveraging of resources, information, expertise, and experience of external stakeholders and co-regulators/co-implementers. Agency experience with programs such as CSI, Sustainable Industry, and Design for the Environment, has shown that stakeholder collaboration also can serve to build stakeholder trust, fostering

non-adversarial, constructive, proactive dialogue. Benefits to external stakeholders also accrue, such as information, access, and resources. It is worthwhile noting that the benefits of integrated sector approaches will accrue even if EPA does not play an active role in the activity, but instead serves as a catalyst for the effort. Indeed, in some cases, the most appropriate role for the Agency may be to support and motivate stakeholders to develop innovative sector-based projects. **Table 3** summarizes the benefits of a sector approach for the various stakeholder groups, while **Appendix I** provides examples of the benefits of solving environmental problems via a sector approach with stakeholder involvement.

The Agency has learned that the implementation of sector-based approaches within Agency core functions needs to involve, to the extent practicable, up-front planning with its co-regulators/ co-implementers (states, tribes, and local governments), because a number of Agency core functions, including permitting, compliance assistance, inspection, and enforcement, are delegated to these co-regulators/co-implementers. In FY 2000, the Agency intends to engage in early planning and collaboration with states, tribes, local governments, and other implementers to help achieve co-regulator/co-implementer buy-in for FY 2001 sector activities. This early planning will allow for co-regulators/co-implementers to prioritize FY 2001 sector-based incentives and plan for them rather than having to accommodate a sector initiative that may have “taken them by surprise.”

Table 3. Summary of Stakeholder Benefits

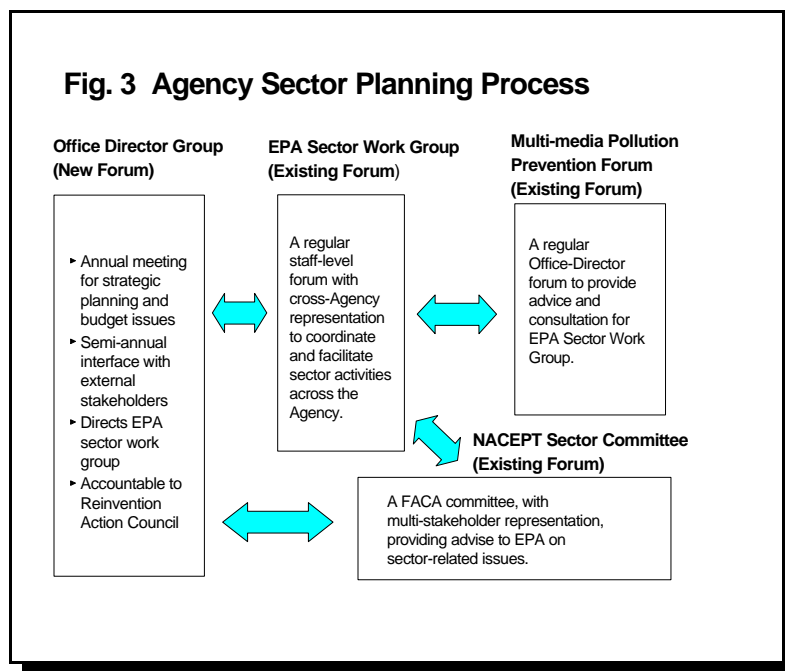
Stakeholder Group	Benefits of a Sector Approach
EPA and other co-regulators/co-implementers such as State, Local and Tribal Governments	<ul style="list-style-type: none"> • An opportunity to set priorities among tasks essential to their missions. • A helpful process to identify regulatory opportunities to improve environmental performance or go beyond compliance.
Regulated Industries	<ul style="list-style-type: none"> • A different way of approaching and gaining access to EPA. • A forum for discussion and presentation of the industry perspective that puts the proposed initiative in context. • An opportunity for regulated entities to work prospectively rather than retrospectively on environmental issues.
Non-governmental organizations and other stakeholders (e.g., environmental, public interest, environmental justice (EJ), and community groups)	<ul style="list-style-type: none"> • An opportunity to directly participate in processes that have traditionally excluded them. • An important opportunity to gain knowledge of and become more involved in technical issues regarding specific sectors. • An opportunity to bring their perspectives to environmental decision-making to balance more narrowly focused regulatory decisions. • A neutral forum to work with regulators and the regulated community that can raise understanding on all sides leading to the development of “win-win” solutions. • An opportunity, particularly for local community and EJ groups, to address issues that directly impact their livelihoods.

4. Building Internal Capacity to Perform Sector-Based Approaches

Another important lesson learned from the Agency's sector work is that without the right tools, the Agency cannot do its job of integrating sector approaches into the way it conducts its core functions. Therefore, a major emphasis of the FY 2000 Action Plan will be to provide management and staff with the necessary infrastructure, management resources, analytical capacity, and resources to conduct cross-Agency multi-media sector work. Attainment of this goal is important, because

unlike the Common Sense Initiative, which was a distinct sector pilot program that had some dedicated funding, this Sector Action Plan encourages Agency programs to consider, where appropriate, an integrated cross-Agency, multi-media sector approach as a way of conducting their "everyday" business. By providing management and staff with the necessary tools, the Agency intends to make it easier for programs to consider integrated, multi-media sector approaches without having to spend resources to retool the way they conduct their everyday business. For example, the FY 2000 Action Plan provides for the establishment of routes of information exchange, analytic tools, and networks of resources to help ensure staff's abilities to carry out sector related tasks. The Plan also acknowledges that sector activities can be sustained by designing incentives for staff and management to conduct sector work.

In FY 99, the Agency convened a Task Force, composed of senior managers from the Agency's major program offices, to identify opportunities for coordinating rulemakings across program offices. The Task Force learned that the Agency could benefit by establishing an on-going sector planning process for identifying multi-media opportunities (both regulatory and non-regulatory) for cross-Agency sector coordination. Such a process is included as a major new "tool" to be employed as part of the FY 2000 Action Plan. This process will play an important role in helping to establish permanent linkages across the Agency to facilitate the use of cross-Agency, multi-media sector approaches to solve environmental problems. The Agency anticipates that this sector coordination process will serve as the main mechanism by which the Agency coordinates sector activities and interacts with external stakeholders. At the core of this process, illustrated in **Figure 3**, is the existing EPA Sector Work Group that meets regularly throughout the year to discuss, coordinate, and facilitate implementation of sector activities across the Agency. The sector planning process will include the convening of an Office Director Group,



accountable to the Reinvention Action Council¹, that will provide overall direction to the EPA Sector Work. The NACEPT Sector Committee will interact with the Office Directors and the Agency Sector Workgroup to provide advice in the planning and conducting of sector activities. The Agency's Multi-media Pollution Prevention Forum will act as consultants to the Sector Work Group. This Sector Planning Process is described in more detail in **Appendix II** of this Action Plan (see description under FY 2000, Action B(1)).

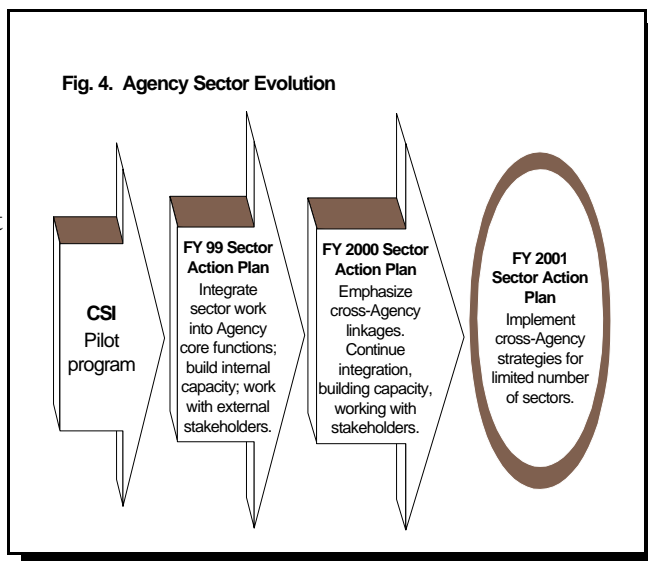
5. Measurement of Sector-Based Approaches

A final lesson learned from Agency sector experience is that you cannot learn from your efforts unless you measure them. In FY 99, the Agency completed a second, third-party evaluation of the CSI program which emphasized the importance of continuing the assessment of the value and benefit of sector-based approaches. For the FY 99 and FY 2000 Sector Action Plans, performance measures are already built into several of the individual project activities. Building on this capacity, the Agency is now preparing an overall framework for measuring the performance of specific sector-based activities and assessing the value of EPA's sector-based work. The framework will suggest potential performance measures for the NACEPT Standing Committee on Sectors, ongoing sector workgroups (three former CSI Subcommittees), and other sector-based activities that are described in the FY 99 and FY 2000 Sector Action Plans developed by the Agency. The framework also proposes methods for evaluating the progress of sector-based activities toward achieving their goals. This framework acknowledges the importance of identifying specific environmental results for these endeavors. In FY 2000, the Agency will measure sector activity in accordance with this measurement framework. The Agency also will conduct more in-depth evaluative studies to gain a better understanding of the results of sector-based activities, the lessons that can be learned from these activities, and the overall effects of sector-based approaches on environmental results. For example, studies will explore how EPA can take the results of the many sector-based pilot projects and scale them up to broader application.

¹EPA's Reinvention Action Council (RAC) is the senior leadership team responsible for guiding reinvention at EPA and is composed of Agency officials from each program office and region; in most cases, the Deputy Assistant Administrator or Deputy Regional Administrator. RAC members are asked by the Administrator to serve on the Council in recognition that reinvention is most successful when senior managers take an active role. RAC members are charged with ensuring that: significant legal and policy issues are brought to resolution; stakeholders have easy access to information and the opportunity to provide meaningful input; people and organizations outside the Agency receive timely answers to their reinvention proposals, questions, and requests.

IV. Sector Activities Included in the FY 2000 Action Plan

The FY 2000 Sector Action Plan includes not only a select set of new sector initiatives, but also incorporates the sector activities that began under the Common Sense Initiative and those that were initiated as part of the FY 99 Sector Action Plan. This “collection” of sector projects does not represent a complete catalogue of all Agency sector activities; instead, it highlights those actions that together, represent an evolution of the Agency’s sector program. This evolution (illustrated in **Figure 4**) began in CSI as a pilot program, where external stakeholders worked collaboratively across Agency program offices to find multi-media solutions to environmental issues in six industry sectors. Many of the sector activities that saw their genesis in CSI continued after the CSI experiment ended in FY 99. These activities laid the foundation for the Agency’s FY 99 Sector Action Plan, a plan that began a two-year transition in sector-based work from the experimental nature of CSI to a more routine way of conducting business in the Agency. The FY 99 Action Plan focused on integrating sector work into Agency core functions, building internal capacity to conduct sector work, and improving the Agency’s capability to work with external stakeholders. The FY 99 Action Plan included a number of actions in a number of sectors that encouraged, but did not necessarily emphasize, cross-Agency, multi-media efforts. Now, in year two of the CSI transition, the FY 2000 Action Plan focuses on sector activities that are multi-media in nature and are demonstrative of cross-Agency cooperation. Looking ahead to FY 2001, the CSI transition will be complete and the Agency will begin to focus on a limited number of sectors, employing an Agency-wide planning process in conjunction with stakeholder input that will create a more strategic, cross-Agency sector action plan.



As noted, many of the new activities in the FY 2000 Plan focus on high priority cross-Agency initiatives with a sector focus (e.g., the PBT Initiative). The FY 2000 Plan also includes several new initiatives recently recommended by an Agency Task Force on Innovative Approaches to Environmental Protection. The purpose of the Task Force was to take stock of EPA's reinvention work and suggest new approaches to address gaps in our current efforts. Working with state partners, and seeking feedback from stakeholders and Agency employees, the Task Force was charged with developing a set of proposals that can be promptly implemented to improve or expand EPA's reinvention activities. The Report of the Innovations Task Force, entitled "Aiming for Excellence: Actions to Encourage Stewardship and Accelerate Environmental Progress," was recently completed and includes a number of key actions that promote sector approaches and stakeholder involvement that will be conducted in FY 2000.

The complete list of actions tracked in the FY 2000 Action Plan appears in **Table 4**, while **Appendix II** provides details of each of the actions. The actions in Table 4 and Appendix II are catalogued according to whether they are continuing CSI projects, continuing FY 99 Action Plan projects, or new for FY 2000. While the CSI projects were focused on six sectors, the FY 99 and 2000 projects affect a variety of sectors. **Appendix III** provides an at-a-glance illustration of the various sectors that are affected by these projects. Finally, **Appendix IV** provides an implementation plan for the projects in the FY 2000 Action Plan.

Table 4. Continuing and New Projects in the FY 2000 Sector Action Plan**Continuing CSI Projects**Permitting

- < Printing-PrintSTEP (See FY 2000 Action Plan)
- < Iron & Steel-General Permitting Issues
- < Iron & Steel-Computerized Permitting System

Rulemaking

- < Comp. & Elec.-CRT Recycling
- < Comp. & Elec.-Zero Wastewater Discharge
- < Iron & Steel-Early Stakeholder Involvement
- < Auto-Vehicle Coating Rulemaking
- < Met. Fin.-RCRA Metal Finishing F006 WW Sludge
- < Comp. & Elec.-Sulfuric Acid Recycling

Enforcement & Compliance

- < Comp. & Elec.-CURE
- < Iron & Steel-Non-Witness Testing
- < Iron & Steel-SEPs
- < Petroleum Refining-RAIRS
- < Met. Fin.-NMFRC
- < Met. Fin.-Tier III Firms
- < Met. Fin.-Tier IV Firms

Solving Regional Problems

- < Iron & Steel-Liaisons (see FY 99 Action Plan)

Voluntary Partnerships

- < Comp. & Elec.-BOLDER
- < Comp. & Elec.-Performance Track
- < Auto-Life Cycle Management
- < Met. Fin.-Strategic Goals (See FY 99 Action Plan)
- < Met. Fin.-Access to Capital
- < Iron & Steel-Brownfields
- < Iron & Steel-Community Advisory Committee
- < Met. Fin.-Metal Finishing 2000 Flexible Track Projects

Research and Applications of Science

- < Petroleum Refining-Equipment Leaks
- < Met. Fin.-Chromium P2
- < Met. Fin.-National R&D Plan (See FY 99 Action Plan)
- < Met. Fin.-Approaching Zero Discharge
- < Met. Fin.-Technology Verification (See FY 99 Action Plan)

Build Management Capacity

- < Comp. & Elec.-Interagency Coordination on Risk Exposure
- < Reinventing Environmental Info.
- < Sector Action Plans
- < Data Gaps
- < Data Quality

Work with External Stakeholders

- < Comp. & Elec.-Enhanced Public Access
- < Stakeholder Action Plan
- < Comp. & Elec.-Product Recovery and Recycling Roundtable

Continuing FY 99 ProjectsPermitting

- < Pollution Prevention in Permitting Project
- < Mass. Environmental Results
- < Sector-Based Permit Reform Projects

Enforcement and Compliance

- < OECA Sector Strategies

Solving Regional Problems

- < Metal Finishing Strategic Goals Program
- < Region 4 POTW Initiative
- < Region 9 Agriculture Initiative
- < Region 10 Mining Initiative

Voluntary Partnerships

- < Sustainable Industry Program
- < Design for the Environment

Research and Applications of Science

- < National Metal Finishing R&D
- < Science to Achieve Results/Environmentally Benign Solvents Research

International

- < Global and Cross-Border Environmental Risks
- < Virtual Sector Guides

Build Management Capacity

- < SIC/NAICS Identification
- < EPA Sector Web Site
- < Sector Tools Compendium
- < Evaluation of Sector Activities
- < Staff Recognition and Reward
- < Annual Plans

Work with External Stakeholders

- < Sector FACA Committee
- < Sector Liaison Network
- < Stakeholder Action Plan

New Projects for FY 2000Permitting

- < PrintSTEP
- < Innovations Task Force-Pollution Prevention in Permitting Project

Rulemaking

- < Coordinated Rulemaking

Enforcement and Compliance

- < Sector "Graduation"
- < Innovations Task Force-Compliance Assistance Clearinghouse

Solving Regional Problems

- < CBEP and Sectors (Binational Toxics Strategy project)

Voluntary Partnerships

- < PBT Initiative
- < Environmental Roadmapping Initiative
- < Innovations Task Force-Environmental Management System Assessment
- < Innovations Task Force-Sector-Specific Voluntary Partnership Programs

International

- < Tributyltin Initiative

Build Management Capacity

- < Agency-Wide Sector Planning Process
- < Performance Measurement

Work with External Stakeholders

- < Innovations Task Force-Public Participation Analysis